

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE: DEPUY ORTHOPAEDICS,	§	
INC. PINNACLE HIP IMPLANT	§	MDL Docket No.
PRODUCTS LIABILITY	§	
LITIGATION	§	3:11-MD-2244-K

**Special Master's Report Relating to Bellwether Trial Selection**

Following the conclusion of the *Paoli* bellwether trial, the Court, with consent of the parties, accepted *ex parte* written submissions and conducted *ex parte* meetings with counsel including consultation with the special master. The Court has the parties' submissions under advisement.

In order to insure the broadest pool of cases for the bellwether selection process, Defendants have agreed they will not raise a venue objection (i.e., a *Lexecon* objection) to any cases in the MDL being tried in the Northern District of Texas. The Plaintiffs' Executive Committee has agreed they will not raise a venue objection (i.e., a *Lexecon* objection) to cases in the MDL filed by their law firms being tried in the Northern District of Texas.

Dated: February 17, 2015.

Respectfully submitted,

/s/ James M. Stanton

James M. Stanton

Stanton Law Firm, P.C.

4350 Beltway Drive

Addison, Texas 75001

Phone: (972) 233-2300

Fax: (972) 692-6812

COURT-APPOINTED SPECIAL MASTER

AGREED TO BY:

/s/

W. Mark Lanier

For the Plaintiffs' Executive Committee

/s/

Seth M. Roberts

For the Defendants

### **CERTIFICATE OF SERVICE**

I certify this document was electronically filed via ECF which, pursuant to Northern District of Texas Local Rule 5.1(d), constitutes service pursuant to the Federal Rules of Civil Procedure.

/s/ James M. Stanton

James M. Stanton